

**REMARKS**

Claims 1-20 remain for reconsideration. Claims 21-47 have been cancelled without prejudice or disclaimer.

All claims stand rejected under 35 U.S.C. § 102(b) as being unpatentable over U.S. Patent 6,636,975 to Khidekel et al. This rejection is respectfully traversed based on the following discussion.

Briefly, embodiments of the present invention are generally directed to systems and methods for authenticating the identity of a second user or caller to a first caller conversing on telephone through a media gateway. As discussed for example on page 27, lines 17-20, embodiments of the present invention are used for “enabling the provision of authentication or identification services to an end-user regarding a caller during or on a call” (emphasis added). As further discussed, for example at page 29, lines 1-4, “...the client device 28 receives a request to “remote authenticate”. For example, the request may be initiated by the Authenticator invoking the authentication feature on his/her client device, such as by speaking a voice command or dialog command into a dialog system or a dialog management module” (emphasis added).

Thus, according to embodiments, a caller, during a call, may authenticate the caller on the other end of the line simply by speaking a voice

command during the call.

Independent claims 1 and 11 have been amended to reflect this feature.

For example, independent claim 1 now recites:

“...establishing a telephone call between the first user and the second user through a media gateway;

detecting a voice command from the first caller during the telephone call;

requesting a certificate corresponding to the second user from an authentication server in response to the voice command...” (emphasis added).

Similarly, independent claim 11 now recites “... in response to a voice command of the first user requesting authentication of the second user, is configured to receive a certificate corresponding to the user of the second client device and the authentication certificate from the authentication server and being configured to authenticate the user of the second client device...” (emphasis added).

The above highlighted features, among others, are not taught or suggested by U.S. Patent 6,636,975 to Khidekel, over which all claims stand rejected. As understood, Khidekel appears to be directed to a system for securing communications between a client browser and a server over the internet or other network using a secure certificates and a security agent and

user biometrics.

As shown in Figure 3, a request for a certificate for authenticity is requested by a browser 204. Indeed, the corresponding passage at column 5, lines 3-4, states "Browser 204 submits a certificate request to certificate authority 214 at 306. The certificate request includes the minutia and identification information. Certificate authority 214 verifies the identification information using conventional methods at 308" (emphasis added).

Thus, Khidekel in no way teaches or suggests allowing one user on a call to verify the other caller's authenticity simply by speaking a dialog voice command as claimed.

MPEP § 2131 mandates that "TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT IN THE CLAIM". Furthermore, the MPEP, citing Richardson v. Suzuki Motor Co., 9 USPQ2d 1051, 1053 (Fed. Cir. 1987), states "[t]he identical invention must be shown in as complete detail as is contained in the... claim" (emphasis added).

Here, Khidekel does not teach or suggest "detecting a voice command from the first caller during the telephone call; requesting a certificate corresponding to the second user from an authentication server in response to the voice command..." as recited in claim 1 and similarly set forth in independent claim 11.

It is therefore respectfully submitted that the rejections to the claims are improper under Section 102 as Khidekel et al. cannot anticipate the

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rejected claims since they do not "teach the identical invention". Further, the highlighted features are not taught or reasonably suggested by Khidekel to support a case of *prima facie* obviousness under § 103. Based on the above discussion with reference to the MPEP guidelines, it is respectfully requested that the rejections be withdrawn.

This being the only rejection to claims 1-20 it is respectfully requested that these claims be allowed.

In view of the foregoing, it requested that the application be reconsidered, that claims 1-20 be allowed and that the application be passed to issue. Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,

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